

January 24, 2024

Via ECF (copy by Federal Express w/ enclosures)

Hon. Denise L. Cote (U.S.D.J.)
U.S. District Court—S.D.N.Y.
500 Pearl Street (Room 1910)
New York, NY 10007

Re: *Donoghue, et. al., v. NextNav, Inc., et. al.*, No. 23-cv-7772-DLC

[Proposed] Scheduling Order

Your Honor:

In advance of the Initial Pre-Trial Conference (IPTC) is currently scheduled for this Friday, January 26, 2024, at 3:30 PM (to be held by phone), the parties jointly submit this Proposed Scheduling Order. A copy of the pleadings (Plaintiffs' Complaint, and Answers filed by Defendant, and Nominal Defendant) are being delivered to Chambers via Federal Express together with a copy of this Proposed Scheduling Order, in accordance with the Court's IPTC Order and Individual Rules of Practice.

<u>Event</u>	<u>Deadline</u>
Initial Disclosures Exchanged	February 9, 2024
Initial Discovery Requests Exchanged	February 23, 2024
Deadline to Amend Pleadings or Join Parties	February 26, 2024
Depositions deadline	April 19, 2024
RFA's, Interrogatories Exchanged	May 1, 2024
Fact Discovery Cutoff	May 28, 2024
Expert Notification Deadline	May 28, 2024
Expert Discovery Deadline	June 28, 2024
Summary Judgment Deadline	July 1, 2024 (if no expert discovery); or August 1, 2024 (if expert discovery)

Respectfully submitted,

/s/ Miriam Tauber
Miriam Tauber
Miriam Tauber Law PLLC
Attorney for Plaintiffs

/s/ Stephen Topetzes
Stephen Topetzes
K&L Gates LLP
Attorney for Defendant
Timothy M. Presutti

* Nominal Defendant NextNav, Inc. does not oppose this Proposed Scheduling Order.
Counsel for Nominal Defendant is cc'd via ECF.